An update: CSE’s exposé on honey adulteration

Webinar on Traceability
January 29, 2021
Bee keepers mentioned that the honey price was decreasing and hinted at sugar syrups

We got the honey tested and found that 77 per cent (17/22) of the honey samples failed the tests of purity — out of 13 brands only 3 passed all tests

- Brands passed: Saffola, Markfed Sohna and Nature’s Nectar (one sample)
- Brands failed: Dabur, Patanjali, Apis, Zandu, Baidyanath, Hitkary, Dadev, Indigenous, Hi Honey, Societe Naturelle
- Laboratory in India did not find adulteration by sugar syrup in big brands

We also found that sugar syrups exist that can bypass Indian tests

- Chinese companies advertise fructose syrup that can bypass tests; same companies also export them to India
- Such syrup is now also manufactured in India — we tracked down a factory in Jaspur, Uttarakhand; In India, it is called “all pass” syrup
- We adulterated pure honey with these syrups and found that upto 50% of adulteration can go undetected on tests as per the FSSAI standards of 2020

It was clear that the business of adulteration has constantly evolved to beat laboratory tests
Honey adulteration not only impacts health, but also livelihood and food productivity

- **It is bad for our health**
  - Honey is also sugar but full of nature’s goodness – something that we are consuming to build immunity against the COVID-19 infection
  - Consuming honey that is sugar will make us more vulnerable especially if we are overweight

- **It also affects the health of our food systems**
  - Due to the adulteration beekeepers are going out of business
  - If beekeepers lose their livelihood, there will be a decline in bees which provide a crucial service as pollinators
  - Without bees we lose productivity of our food.
Our ask from government, industry and the consumer

- **First:** Need to stop import of syrups and honey from China
  - Regulation is tough; need to stop all imports. It begins the clean-up – but not enough

- **Second:** Need to strengthen enforcement in India – public testing so companies are held responsible. Cannot play with our health
  - Including NMR, however important, will be short-term as Chinese companies will design NMR bypass syrups
  - Test samples; make result public and hold companies responsible. If CSE can do this investigation and tests using NMR, FSSAI certainly can do this and more
  - **Every honey selling company must be required to be able to trace back the origins of the honey – from the beekeeper to the hive.**

- **Third:** We consumers must be able to tell adulteration by the taste, the smell and the colour. Our health is in our hands.
  - Consumer choice for liquid honey shaping busines of adulteration; This is why adulterated honey thrives; honey which does not crystallize is no guarantee of a pure honey.
  - **Consumers must demand change – crystallization of honey is not bad, it is honey properties, for instance**
Response: massive and shows consumer interest in safe and nutritious food

- Secretariat of Vice-President, Shri M Venkaiah Naidu wrote to Secretary (MoHFW) for communicating the action taken in this matter
- Dr Vinod K Paul, Member, NITI Aayog wrote about passing on our report for appropriate action
- The Central Consumer Protection Authority had asked FSSAI to take action and extended cooperation in investigation for taking class action, under Section 10 of the New Consumer Protection Act.
- In a response to a petition by a journalist in Odisha, the National Human Rights Commission has directed the FSSAI to take appropriate action within 8 weeks and inform the complainant.
- FDA commissioner, Tamil Nadu directed inspection of honey manufacturing / processing units and lift surveillance samples
- FDA commissioner, Haryana wrote to food safety officers in the state to take necessary action

We also received massive support from public/experts/consumers from across the country through emails, letters, tweets.
There is some news in the media about likely action on syrup imports; if it happens, will solve part of the problem

- Shri Nitin Gadkari, Union minister, MSME raised the issue of large quantity import of fructose syrup and its use in adulteration of honey in a letter to the Union commerce minister, Shri Piyush Goyal.

- Shri V K Saxena, chairperson, Khadi and Village Industries Commission (KVIC), has also raised the issue with the commerce minister.

- We understand there are discussions underway to see if such a ban is feasible and can be implemented.

- But this one step will not be enough – Indian manufacturers of syrup exist. We need more enforcement; we need traceability.
Dec 4: Meeting at FSSAI with Chairperson, CEO and colleagues. We presented the findings; how investigation was conducted; responded to queries and shared:

- Sample of the ‘all-pass’ syrup, which CSE procured from Jaspur, Uttarakhand and company details
- Full correspondence with the two Chinese companies from whom CSE procured the syrup samples
- Details of the Fedex consignment that CSE was not able to accept as it did not have the necessary documentation
- FSSAI raised the issue that CSE had not tested SMR in the spiked samples. This was said to be important as it could mean that the adulteration with rice syrup would have been detected and the sample would have failed.
Follow up: FSSAI on SMR

- Dec 10: as requested by FSSAI, we shared detailed laboratory reports of the Indian and the German laboratory.
- Dec 17: Met FSSAI Chairperson and CEO
  - Shared laboratory reports of the two additional samples, which were adulterated with 25 and 50 percent syrup procured from Jaspur, India – we had tests done after discussions with FSSAI in December 4th.
- The adulterated sample of honey (25 and 50%) had passed the SMR tests.
- Based on these additional tests and the tests on the spiked samples conducted previously, we can conclude that modified-syrups produced in factories have been designed to bypass the Indian standards of 2020.
Post our study: actions are being considered but not public enough/strong enough to give message to Companies/Consumers

- We understand that FSSAI so far:
  - Has written to CBIC, Department of Revenue to make mandatory the end use declaration by importers as per HS codes
  - Commissioned a study and asked for data from companies
  - Convened a meeting with experts from its scientific panel, which focused on revision of standards (which have been developed over the last several years and considered better compared to other countries)

- But there is no message from FSSAI that syrup exists that can bypass Indian standards

- So companies continue to claim that their honey passes all FSSAI parameters -- misleading consumers
Honey selling companies adopted a mix of strategies

- Issued statements/found quoted/tweets on one or more:
  - Our report was motivated and aimed at maligning the brand
  - It was a plot to defame the Indian natural honey industry
  - That their products comply with the FSSAI standards

- Aggressively advertising in mass media such as TV, newspapers and digital medium. Citing the TAM (Television Audience Measurement) report, the Financial Express on Jan 04, 2021 reported (Link):
  - Advertising volumes grew 9 times in print medium for honey category in Dec ‘20 compared to Nov ‘20; On digital media it was up by a factor of four
  - Advertising volume for Patanjali Honey has grown 17 times on TV (Nov to Dec ‘20)
  - Seven-fold increase in advertising for Dabur Honey in November-December 2020 over the same period last year.

- Confusing consumer with jugglery in new advertisements (Dabur); to the extent of going opposite to the claims made earlier around NMR testing. Also telling them that they comply with FSSAI parameters.
Jugglery around NMR!

After CSE study (December 03): Dabur’s advertisement mentioned “is source NMR tested”

Before CSE study: Dabur’s advertisement claimed “NMR tested pure honey”
Honey company advertisements pushing the idea that they comply with FSSAI parameters!
Also on social media: Continued emphasis on the issue of SMR tests and complying with FSSAI standards; **would have stopped if there was a strong action**
1. Build dialogue and engagement with beekeepers to understand issues and to see how practices can be improved for the benefit of honey collectors from forest/tribal communities

2. Understand how traceability in this business can work – not just for honey but for other products

- It is clear we need food to work for our nutrition; for nature and for livelihoods of communities -- this remains our agenda